

XAVIER BECERRA
Attorney General of California
MARK R. BECKINGTON
ANTHONY R. HAKL
Supervising Deputy Attorneys General
GABRIELLE D. BOUTIN, SBN 267308
ANNA T. FERRARI, SBN 261579
TODD GRABARSKY, SBN 286999
R. MATTHEW WISE, SBN 238485
NOREEN P. SKELLY, SBN 186135
Deputy Attorneys General
1300 I Street, Suite 125
P.O. Box 944255
Sacramento, CA 94244-2550
Telephone: (916) 210-6053
Fax: (916) 324-8835
E-mail: Gabrielle.Boutin@doj.ca.gov
*Attorneys for Plaintiff State of California, by and
through Attorney General Xavier Becerra*

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**STATE OF CALIFORNIA, by and through
Attorney General Xavier Becerra,**

Plaintiff,

v.

**WILBUR L. ROSS, JR., in his official
capacity as Secretary of the U.S.
Department of Commerce; U.S.
DEPARTMENT OF COMMERCE; RON
JARMIN, in his official capacity as Acting
Director of the U.S. Census Bureau; U.S.
CENSUS BUREAU; DOES 1-100,**

Defendants.

3:18-cv-01865

PLAINTIFFS' WITNESS LIST

Dept: 3
Judge: The Honorable Richard G.
Seeborg
Trial Date: January 7, 2019
Action Filed: March 26, 2018

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and this Court's December 3, 2018, Order Re: Joint Motion for Administrative Relief (ECF No. 99), Plaintiffs State of California, County of Los Angeles, City of Los Angeles, City of Fremont, City of Long Beach, City of Oakland, and City of Stockton hereby submit the following witness list for trial in this case on January 7, 2018.

PRELIMINARY STATEMENT

Plaintiffs reserve the right to amend or augment this witness list, including for the purposes of impeachment or rebuttal, up to and during the time of trial. These disclosures are based upon the facts and information presently known and available to Plaintiffs. To the extent any witness has not been previously identified, Plaintiffs agree to meet and confer regarding related discovery, if necessary.

WITNESS LIST

Plaintiffs expect to present the following witnesses at trial.

I. WITNESSES BY LIVE TESTIMONY OR DECLARATION

- Dr. John Abowd.
- Douglas Baron. Mr. Baron may be reached by contacting Plaintiffs' counsel.
- Amy Bodek. Ms. Bodek may be reached by contacting Plaintiffs' counsel.
- Dr. Matthew Barreto (expert). Dr. Barreto may be reached by contacting Plaintiffs' counsel.
- Dr. Bernard Fraga (expert). Dr. Fraga may be reached by contacting Plaintiffs' counsel.
- Dr. Hermann Habermann (expert). Dr. Habermann may be reached by contacting Plaintiffs' counsel.
- Dr. Lisa Handley (expert). Dr. Handley may be reached by contacting Plaintiffs' counsel.
- Dr. Colm O'Muircheartaigh (expert). Dr. O'Muircheartaigh may be reached by contacting Plaintiffs' counsel.
- Dr. Andrew Reamer (expert). Dr. Reamer may be reached by contacting Plaintiffs' counsel.
- Andrew Westall. Mr. Westall may be reached by contacting Plaintiffs' counsel.

II. WITNESS BY TRIAL DEPOSITION

- Pamela Karlan (expert).

III. WITNESSES BY DISCOVERY DEPOSITION

- Dr. John Abowd, as an individual, as an agent of the Census Bureau, and as the Census Bureau's Federal Rule of Civil Procedure 30(b)(6) representative.
- Earl Comstock.
- John Gore.
- Ron Jarmin.
- Karen Dunn Kelley.
- David Langdon.
- A. Mark Neuman.
- Sahra Park-Su.
- Wendy Teramoto.

IV. OTHER WITNESSES

Plaintiffs also join and incorporate in this disclosure all witnesses identified by Plaintiff-in-Intervention Los Angeles Unified School District, and all witness identified by plaintiffs in the related action of *City of San Jose v. Ross*, U.S.D.C., N.D. Cal., case no. 3:18-cv-02279.

1 Dated: December 12, 2018

Respectfully Submitted,

2 XAVIER BECERRA
Attorney General of California
3 MARK R. BECKINGTON
ANTHONY R. HAKL
4 Supervising Deputy Attorneys General
ANNA T. FERRARI
5 TODD GRABARSKY
R. MATTHEW WISE
6 NOREEN P. SKELLY
Deputy Attorneys General
7

8 /s/ Gabrielle D. Boutin
GABRIELLE D. BOUTIN
9 Deputy Attorney General
Attorneys for Plaintiff State of California, by and
10 *through Attorney General Xavier Becerra*

11 Dated: December 12, 2018

/s/ Charles L. Coleman
12 CHARLES L. COLEMAN III, SBN 65496
DAVID I. HOLTZMAN
13 HOLLAND & KNIGHT LLP
50 California Street, 28th Floor
14 San Francisco, CA 94111
Telephone: (415) 743-6970
15 Fax: (415) 743-6910
Email: charles.coleman@hklaw.com
16 *Attorneys for Plaintiff County of Los Angeles*
17

18 Dated: December 12, 2018

MIKE FEUER
City Attorney for the City of Los Angeles

19 /s/ Valerie Flores
20 VALERIE FLORES, SBN 138572
Managing Senior Assistant City Attorney
21 200 North Main Street, 7th Floor, MS 140
Los Angeles, CA 90012
22 Telephone: (213) 978-8130
Fax: (213) 978-8222
23 Email: Valerie.Flores@lacity.org
24
25
26
27
28

1 Dated: December 12, 2018

HARVEY LEVINE
City Attorney for the City of Fremont

2
3 /s/ Harvey Levine
SBN 61880
3300 Capitol Ave.
4 Fremont, CA 94538
Telephone: (510) 284-4030
5 Fax: (510) 284-4031
Email: hlevine@fremont.gov

7 Dated: December 12, 2018

CHARLES PARKIN
City Attorney for the City of Long Beach

8
9 /s/ Michael J. Mais
MICHAEL K. MAIS, SBN 90444
Assistant City Attorney
10 333 W. Ocean Blvd., 11th Floor
Long Beach CA, 90802
11 Telephone: (562) 570-2200
Fax: (562) 436-1579
12 Email: Michael.Mais@longbeach.gov

13 Dated: December 12, 2018

BARBARA J. PARKER
City Attorney for the City of Oakland

14
15 /s/ Erin Bernstein
MARIA BEE
16 Chief Assistant City Attorney
ERIN BERNSTEIN, SBN 231539
17 Supervising Deputy City Attorney
MALIA MCPHERSON
18 Deputy City Attorney
City Hall, 6th Floor
19 1 Frank Ogawa Plaza
Oakland, California 94612
20 Telephone: (510) 238-3601
Fax: (510) 238-6500
21 Email: ebernstein@oaklandcityattorney.org

22 Dated: December 12, 2018

JOHN LUEBBERKE
City Attorney for the City of Stockton

23
24 /s/ John Luebberke
SBN 164893
25 425 N. El Dorado Street, 2nd Floor
Stockton, CA 95202
26 Telephone: (209) 937-8333
Fax: (209) 937-8898
27 Email: John.Luebberke@stocktonca.gov
28

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), regarding signatures, I hereby attest that concurrence in the filing of this document has been obtained from all signatories above.

Dated: December 12, 2018

/s/ Gabrielle D. Boutin
GABRIELLE D. BOUTIN

CERTIFICATE OF SERVICE

Case Name: **State of California, et al. v.** No. **3:18-cv-01865**
Wilbur L. Ross, et al.

I hereby certify that on December 12, 2018, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

PLAINTIFFS' WITNESS LIST

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on December 12, 2018, at Sacramento, California.

Eileen A. Ennis

Declarant

/s/ Eileen A. Ennis

Signature